

Exhibit C

**CERTIFICATION IN SUPPORT OF LEAD PLAINTIFF MOTION FOR
SECURITIES CLASS ACTION**

I, Chase Williams, hereby certify that the following is true and correct to the best of my knowledge, information, and belief:

1. On June 8, 2020, I executed my certification that was previously filed in this case. I understood at that time, and still understand, that my certification is under penalty of perjury and has the force and effect of being sworn. In abundance of caution, I am executing this supplemental certification.
2. I have reviewed the complaint filed herein (the “Complaint”), and have authorized the filing of a lead plaintiff motion on my behalf.
3. I did not purchase the security at issue in the Complaint at the direction of my counsel or in order to participate in any private action arising under the Securities Act of 1933 (the “Securities Act”) or the Securities Exchange Act of 1934 (the “Exchange Act”).
4. I am willing to serve as a representative party on behalf of the class (the “Class”) as defined in the Complaint, including providing testimony at deposition and trial, if necessary.
5. During the class period, as defined in the Complaint, I purchased the unregistered security TRX on Binance. Attached as Appendix A is a true and accurate listing of these transactions.
6. I have previously sought to serve as representative in the following class actions arising under the Securities Act and Exchange Act: (1) *Lee et al. v. Binance et al.*, Case No. 1:20-cv-02803-ALC (S.D.N.Y. Apr. 3, 2020); (2) *Williams et al. v. HDR Global Trading Limited et al.*, Case No. 1:20-cv-02805-ALC (S.D.N.Y. Apr. 3, 2020); (3) *Williams et al. v. Block.one et al.*, Case No. 1:20-cv-02809-LAK (S.D.N.Y. Apr. 3, 2020); (4) *Williams et al. v. KuCoin et al.*, Case No. 1:20-cv-02806-GBD (S.D.N.Y. Apr. 3, 2020).
7. I will not accept any payment for serving as a representative party on behalf of the Class beyond my pro rata share of any possible recovery, except for an award, as ordered by the court, for reasonable costs and expenses (including lost wages) directly relating to my representation of the Class.
8. I understand that executing this Certification is not a prerequisite to participation in this Class Action as members of the Class.
9. I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2020.



Chase Williams

Appendix A
Chase Williams's Transactions in TRX on Binance

Date(UTC)	Market	Type	Price	Amount	Total
2019-05-08 16:53:00	TRX/BTC	SELL	0.00000416	337190	1.40547373
2019-05-08 02:05:12	TRX/BTC	BUY	0.00000426	337027	1.43570407